

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NINA SHAHIN,

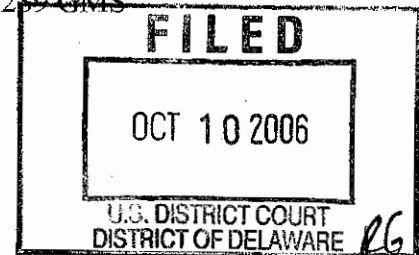
Plaintiff,

v.

STATE OF DELAWARE
DEPARTMENT OF FINANCE

Defendant,

C.A. No. 06-289-GMS



**PLAINTIFF'S SECOND MOTION TO AMEND THE ORIGINAL CLAIM AND
TO ENLARGE THE SCOPE OF THE LAWSUIT TO INCLUDE OTHER
INCIDENTS OF DISCRIMINATION**

COMES NOW Plaintiff, Nina Shahin, and respectfully moves this Honorable Court to enter an Order Granting an amendment of original complaint and enlargement of scope of the lawsuit pursuant to Fed. R. Civ. P. (15)(c) to include 2 additional incidents of discrimination alleged by the plaintiff that have not been filed as discrimination claims yet. The incidents that are requested to be included are listed at the Exhibit A attached to this Motion.

PLAINTIFF

October 6, 2006

A handwritten signature in cursive script, appearing to read "N. Shahin".

NINA SHAHIN

**103 Shinnecock Rd.
Dover, DE 19904
(302)678-1805**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NINA SHAHIN,)	
)	
Plaintiff,)	
)	
vi.)	C.A. No. 06-289 GMS
)	
STATE OF DELAWARE)	
DEPARTMENT OF FINANCE)	
)	
Defendant,)	

ORDER

AND NOW, this ____ day of _____, 2006, Plaintiff's Motion for Amendment and Enlargement of the Original Complaint having been heard and considered by the Court, it is hereby **ORDERED** that the Motion is **GRANTED** and the defendant shall file a responsive pleading to the Amended Complaint on or Before **November 5, 2006**.

J.

EXHIBIT A**PENDING CASES**

	Position/Division	Date Applied	Dated Denied	Current Status
11.	Accountant IV	06/27/2006	09/06/2006	Have not applied to DE Dept. of Labor
12.	Accountant V	06/28/2006	09/06/2006	- " -

CERTIFICATE OF MAILING AND/OR DELIVERY

The undersigned certifies that on October 6, 2006, she caused the attached *Plaintiff's Motion to Amend the Original Claim and to Enlarge the Scope of the Suit to Include Other Incidents of Discrimination* to be delivered to the following persons in the form and manner indicated:

NAME AND ADDRESS OF RECIPIENTS:

1. **U.S. District Court**
844 King Street
U.S. Courthouse
Wilmington, DE 19801

MANNER OF DELIVERY:

Original and a copy by certified mail with return receipt

2. **Stephani J. Ballard, # 3481**
Deputy Attorney General
Department of Justice
State of Delaware
Carvel State Office Building
820 North French Street, 6th fl.
Wilmington, DE 19801
Attorney for Defendant

MANNER OF DELIVERY:

Two true copies by first class mail, postage prepaid



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Nina Shahin, CPA, MAS, MST
103 Shinnecock Rd.
Dover, DE 19904



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Wilmington, DE 19801

RETURN RECEIPT
REQUESTED

CONTENTS
☐ LIQUID
☐ FRAGILE
☐ PERISHABLE
☐ POTENTIALLY HAZARDOUS
☒ NONE OF THE ABOVE